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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	Case No.: 2:15-cr-0057-RFB
Plaintiff,)	
)	STIPULATION TO CONTINUE HEARING
vs.)	ON DEFENDANT'S MOTION FOR A BILL
)	OF PARTICULARS
CARLOS INCLAN, JR.,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED, by and between DANILE G. BOGDEN, United States Attorney, and SUSAN CUSHMAN, Assistant United States Attorney, and Cristen Thayer, Assistant Federal Public Defender, counsel for the defendant, that the hearing on defendant's Motion for a Bill of Particulars be continued from January 17, 2017, to January 24, 2017, or as soon thereafter as convenient to the Court and both counsel. Counsel for the government is unavailable the week of February 6, 2017.

This stipulation is entered into for the following reasons:

1. Counsel for the government has a contested sentencing hearing in *United States v. Sha-ron Haines*, 2:14 cr 0264-APG-VCF set for January 17, 2017 at 1:30 p.m. The hearing is expected to last several hours. Both sides are calling expert witness and have finalized travel arrangements for out of state witnesses.

2. Trial in this case is set for April 27, 2017 (Doc. # 48).
3. The defendant is not detained and does not object to the continuance
4. Both parties agree to the continuance.
5. This time is excludable pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(1)(D) because pretrial motions are pending before the Court.
6. This is the third request to continue the hearing.

Dated this _____ day of January, 2017.

Respectfully submitted,

DANIEL G. BOGDEN
United States Attorney

/s/ Susan Cushman

SUSAN CUSHMAN
Assistant United States Attorney

/s/ Cristen Thayer

CRISTEN THAYER
Counsel for Defendant Jimenez

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARLOS INCLAN, JR.,

Defendant.

Case No.: 2:15-cr-0057-RFB

ORDER TO CONTINUE HEARING ON
DEFENDANT'S MOTION FOR A BILL OF
PARTICULARS

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby orders that the Hearing on Defendant's Motion for a Bill of Particulars in the above-captioned matter set for 1/17/2017 be vacated and continued until 2/03/2017 at the hour of 10:00 a.m., in LV Courtroom 7D.

DATED this 12th day of January 2017.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE